

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit.)

Date: June 24, 2003

Program: Air Management

Item: PPA-1

PPA TITLE: Program Administration/Management

PROJECTED STATUS AT END OF FY2003:

PLANNED COMMITMENT FOR FY2004-2005:

A. Work-years of effort: 2.5

A. Work-years of effort: 2.5

B. Key responsible person(s): G. Vinson Hellwig

B. Key responsible person(s): G. Vinson Hellwig

C. Key responsible group: Administration

C. Key responsible group: Administration

D. Estimated total PPA costs: \$ 187,750

D. Estimated total PPA costs: \$ 190,675

E. **FY03 Status Narrative:** (See PPA instruction sheet.)

The City of Grand Rapids contract was approved by the State Administrative Board on June 3, 2003. Coordination of the Air Monitoring Program continues. Audits have been conducted in a timely manner and will continue to occur.

Cost accounting/expenditure tracking systems will provide the financial information to project costs for the Fiscal Years (FY) 2004 and 2005 application.

The final report will be submitted in the format requested by the EPA.

The Air Quality Division (AQD) continues to provide ample opportunities for public involvement in the Michigan Air Pollution Control Program through a number of different avenues. The Michigan Department of Environmental Quality (MDEQ) Air Webpage; public meetings, public hearings, public notices in newspapers, routine verbal communications, as well as written communications are all parts of the on-going public involvement in the State Air Program.

F. **FY2004-2005 Commitment Narrative:**

Grant Negotiation/Submission: The AQD commits to work with the EPA to negotiate the annual cooperative agreement and amendments. It must be recognized that the EPA must provide timely guidance to allow the AQD to meet established deadlines, and in the event that this timely guidance is not provided, reasonable deadlines will be established for the AQD to meet.

Reports: The AQD commits to submitting an end-of-year report by the date established in the EPA's FY2004-2005 Guidance. This end-of-year report will include reporting of P2 accomplishments. The final Financial Status Report will be submitted when completed.

MBE/WBE/EEO: The AQD commits to continuing implementation of this effort. Assistance has been discussed with Region V to insure that all opportunities are taken.

The AQD commits to continue to manage state contracts and local agency agreements, as well as provide fiscal and programmatic support for the City of Grand Rapids.

Good Neighbors United Initiative (GNUI): The AQD will continue the involvement in the Fugitive Dust, and Odor work groups.

Public Information/Education: The AQD continues to provide ample opportunities for public involvement in the Michigan Air Pollution Control Program through a number of different avenues. Public meetings, public hearings, public notices in newspapers, routine verbal communications, as well as written communications are all parts of the on-going public involvement in the State Air Program.

Informational materials continue to be developed that allow citizens and industry to make informed decisions related to ambient air quality issues. Partnership programs are increasingly utilized as an effective method of communication regarding voluntary pollution reduction. Environmental education efforts targeting both the general public and Grades K-12 are earmarked for evaluation and implementation. In addition, the AQD provides real time Air Quality Index (AQI) and ozone mapping via the Internet on the AQD Homepage.

Safety/Training: The AQD continues to provide safety training and career development for all employees.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit.)

Date: June 27, 2003

Program Category: Air Management

Index: PPA-2

PPA TITLE: Attainment and Maintenance Planning and Implementation

PROJECTED STATUS AT END OF FY2003:

PLANNED COMMITMENT FOR FY2004-2005:

A. Work-years of effort: 5.0

A. Work-years of effort: 5.0

B. Key responsible person: Robert Irvine

B. Key responsible person: Robert Irvine

C. Key responsible group: Strategy Development Unit

C. Key responsible group: SDU/ERA Units

D. Estimated total PPA costs: \$ 375,500

D. Estimated total PPA costs: 381,350

Program Plan Elements (See PPA instruction sheet)

E. FY2003 Status:

The MDEQ is providing recommendations to EPA on non-attainment area designations for ozone based on the new 8 hour NAAQS and will provide comments to EPA on the draft implementation guidance for the new 8 hour standard.

The MDEQ continued air quality monitoring and data collection in maintenance areas. See PPA-5 and PPA-6 descriptions of this and all other monitoring and inventory activities, respectively.

The MDEQ is completing a revision to the maintenance plan for the Southeast Michigan 1 hour ozone maintenance area. The MDEQ continued to implement contingency measures; Stage I vapor recovery controls, and lower RVP (7.8) gasoline during the summer season. In addition, the MDEQ participated in and provided technical support for Ozone Action voluntary emission reduction programs in Southeast and West Michigan.

The MDEQ continued to implement the Transportation Conformity SIP where applicable; reviewed and provided input to metropolitan planning organizations on conformity analyses; and provided letters of comment or approval to MDOT, FHWA, and EPA. The MDEQ implemented the General Conformity SIP and reviewed general conformity analyses and provided comments to the appropriate agencies.

The MDEQ continued to participate in LADCO. This included participation in Project Team calls and meetings as well as work in the modeling, data analysis, emissions, and growth/strategy committees. Michigan completed work on revising Rule 801 for statewide NOx controls and Rules 802-817 for compliance with EPA's NOx SIP call. In addition, the MDEQ continued working with our Regional Planning Organization

(LADCO) in addressing regional haze requirements.

Concerning the PM-10 and PM-2.5 NAAQS, the MDEQ kept abreast of activity regarding revision and implementation of these standards, respectively.

The MDEQ completed rulemaking activities on a variety of revisions to air rules, including new NO_x control rules, a revision to the definition of VOC, and revisions to New Source Review rules in Part 2.

F. FY2004-2005 Commitment:

1. Ozone SIP

The MDEQ will continue to provide input to EPA on non-attainment area designations for ozone based on the new 8 hour NAAQS and will continue to work with EPA in the development of programs for implementing the new standard.

The MDEQ will continue to keep abreast of activity involving the ozone standard and will review EPA proposals on the ozone standard as it becomes available.

The MDEQ will continue to implement SIP requirements for ozone maintenance areas regarding monitoring (see PPA-5) and development of periodic emission inventories (see PPA-6). MDEQ will implement control measures in maintenance areas, if necessary. The MDEQ will also continue ozone monitoring throughout the state as described in our air monitoring network plan (see PPA-5).

The MDEQ will continue to implement the NO_x SIP call program.

The MDEQ will continue to participate in LADCO ozone-related activities, gearing up for SIP modeling and development for the 8-hour ozone standard in the LADCO region. MDEQ will continue to work with LADCO in developing modeling for assessing PM 2.5 issues in the state and region. In addition, the MDEQ will continue to participate in planning and technical activities for addressing the regional haze program through the LADCO Regional Planning Organization.

The MDEQ will continue to participate in and provide technical support for Ozone Action voluntary emission reduction programs. The MDEQ will continue to pursue implementation of pollution prevention in its programs.

The MDEQ will continue to review and provide input to metropolitan planning organizations on transportation conformity analyses and provide letters of comment or approval to MDOT, FHWA and EPA as appropriate. The MDEQ will review general conformity analyses and provide comments to the appropriate agencies.

2. Miscellaneous – Rules

The MDEQ will complete rulemaking on revisions to Part 4 rules pertaining to Wayne county sources. Rulemaking will begin on a rule for commercial and industrial solid waste incinerators, a rule for small municipal combustors, revisions to Rule 932 for large municipal combustors, a rule for secondary aluminum sources, and PSD rules. Rulemaking on other rule packages, as necessary, will be undertaken.

3.

PM-2.5 SIP

The MDEQ will provide recommendations to EPA on non-attainment areas for PM-2.5 and will work with EPA in the development of programs for implementing the revised PM-2.5 NAAQS. The MDEQ will continue to keep abreast of activity involving the PM-2.5 standard and will review EPA guidance on PM-2.5 as it becomes available. MDEQ will continue to work with LADCO in model development eventually leading to SIP development.

4. PM-10 SIP

The MDEQ will continue to implement the PM-10 maintenance plan and initiate contingency measures, if required.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 23, 2003

Program: Air Management

Index: PPA-3

PPA Title: Air Toxics

PROJECTED STATUS AT END OF FY2003:
2005:

PLANNED COMMITMENT FOR FY2004-

A. Work-Years of Effort: 5.6

A. Work-Years of Effort: 4.6

B. Key Responsible Person: Cathy Simon

B. Key Responsible Person: Cathy Simon

Key Responsible Group: Toxics Unit

C. Key Responsible Group: Toxics Unit

D. Estimated Total PPA Costs: \$ 420,560

D. Estimated Total PPA Costs: \$ 350,842

E. FY2003 Status Narrative:

F. FY2004 – FY2005 Commitment Narrative:

The AQD will administer Section 112 standards in accordance with the direct final rule approving Michigan's request for delegation under Section 112(l) of the Clean Air Act (63 FR 64632, November 23, 1998), and as outlined in the memorandum of agreement (MOA) between the USEPA and the MDEQ, signed by David Kee on May 8, 1996, and Dennis Drake on May 16, 1996. The AQD will administer the requirements of Section 111 and 129 for municipal waste combustors, landfills, medical waste incinerators, and commercial and industrial solid waste incinerators as described in PPA-2.

The AQD will develop health based screening levels for toxic air contaminants emitted from all sources subject to the State's air toxic regulations. These screening levels will be used to ensure emissions of toxic air contaminants from these sources do not adversely impact human health. For sources subject to the State's air toxic regulations and where the AQD identifies a potential concern for exposures beyond direct inhalation, cumulative exposures, or interactive effects of air toxics, further risk assessment work will be done to address these concerns.

The AQD will maintain a staff contact to refer questions on indoor air issues to the proper agencies for response.

The AQD will participate in the bimonthly State/Region 5 risk assessment conference calls.

As resources allow, the AQD will analyze the data from the Detroit air toxics monitoring pilot project for issues not covered in any national contract, including characterization of the potential health risks from air toxics in the area. Other air toxics monitoring commitments are in the Monitoring PPA.

The AQD will help promote outreach on voluntary emission control retrofit programs for existing heavy-duty diesel engines/school buses as resources allow.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 16, 2003

Program: Compliance Program

PPA #: PPA-4-1

PPA Title: Inventory and Reporting

PROJECTED STATUS AT END OF FY 2003:

PLANNED COMMITMENT FOR FY2004-2005:

A. Work-years of effort: 14.0

A. Work-years of effort: 14.0

B. Key responsible person(s): Gerald Avery & Michael Bray

B. Key responsible person(s): Gerald Avery & Michael Bray

C. Key responsible group: Compliance Support And Dry Cleaning Unit

C. Key responsible group: Field Operations Section Technical Programs Unit

D. Estimated total PPA costs: \$ 1,051,400

D. Estimated total PPA costs: \$ 1,067,780

E. **FY2003 Status Narrative:**

Refer to the end of year status narrative for FY2002 provided as part of the 4th quarter report.

F. **FY2004-2005 Commitment Narrative:**

For non-Title V sources, the MDEQ will:

1.0 Maintain Inventory of sources subject to federal regulations.

The MDEQ commits to maintain an up-to-date inventory for sources including New Source Performance Standards (NSPS), non-transitory National Emission Standards for Hazardous Air Pollutants (NESHAP) sources (including sources subject to promulgated Maximum Achievable Control Technology (MACT) standards as notification is provided or through inspections that identify MACT applicability), and sources avoiding New Source Review (NSR)/Prevention of Significant Deterioration (PSD) review through permit restrictions (synthetic minor).

2.0 Quarterly Reports

Within 30 days of the end of each quarter, the MDEQ commits to submit quarterly reports to the EPA. The reports will include the following information:

- a) Identification of all NSPS, non-transitory NESHAP (including MACT facilities) and synthetic minor sources, added that quarter to the inventory of sources, with the following information provided as available: Facility name and address, the MDEQ registration number, Standard Industrial Classification code, and NESHAPS subpart(s) to which the facility is subject.

- b) The quarterly compliance status of all NSPS and non-transitory NESHAP facilities. This shall include all revisions in compliance status since the last report, such as: violations observed, required facility reporting that is delinquent or missing, CEMS violations, newly discovered sources that have avoided NSR/PSD review, violations of the MDEQ enforcement settlements resolving High Priority Violations (HPV*), and past violations that were resolved during the quarter.
- c) The dates of the partial compliance evaluation that included an on-site inspection conducted on NSPS and non-transitory NESHAP facilities during the reporting quarter.

Identification of sources for which NESHAP and MACT waiver requests have been received during the quarter and the status of action on such requests.

3.0 Reports As Needed

- 3.1 The MDEQ will continue to provide copies of all draft administrative consent orders for federally regulated sources to the EPA during the public comment period. Copies of final compliance orders and consent decrees approved by the MDEQ will be provided to Region V after final signatures are obtained.
- 3.2 The MDEQ commits to provide documentation on individual NSPS, and non-transitory NESHAP violations within 30 days of the EPA's request.
- 3.3 The MDEQ commits to submit inspection reports to the EPA upon request.
- 3.4 HPVs* will be identified in monthly conference calls. See PPA 4-3.

4.0 Compliance Monitoring Strategy (CMS)

The MDEQ has allocated resources to the completion of a CMS plan to upload air compliance and enforcement data directly into AFS. The MDEQ commits to work with EPA Region V to install, activate and use the Universal Interface as feasible software becomes available and operational.

Notes: [*] High Priority Violations are as defined in the HPV/T&A Guidance dated December 22, 1998.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 16, 2003

Program: Compliance Program

PPA #: PPA-4-2

PPA Title: Compliance Assessment

PROJECTED STATUS AT END OF FY2003:

PLANNED COMMITMENT FOR FY2004-2005:

A. Work-years of effort: 15.0

A. Work-years of effort: 15.0

B. Key responsible person(s): Gerald Avery & Michael Bray

B. Key responsible person(s): Gerald Avery & Michael Bray

C. Key responsible group: Compliance Support and Dry Cleaning Unit

C. Key responsible group: Field Operations Section & Technical Programs Unit

D. Estimated total PPA costs: \$ 1,126,500

D. Estimated total PPA costs: \$ 1,144,050

E. **FY2003 Status Narrative:**

Refer to the end of year status narrative for FY2002 provided as part of the 4th quarter report.

F. **FY2004-2005 Commitment Narrative:**

For non -Title V sources, the state will:

1.0 SIP, NSPS, non-transitory NESHAP and MACT, and Minor Source Inspections

- 1.1 The state commits to conduct at least a partial compliance evaluation that includes an on-site inspection for the more significant processes at non-Title V sources selected using the Compliance Monitoring Strategy (CMS) for stationary source inspections.
- 1.2 Responsibility for the state dry cleaning program was transferred to Air Quality Division in September 2002 and placed in the Technical Programs Unit. The staff assigned to this program now inspects dry cleaning establishments for compliance with state rules and the perchloroethylene NESHAP. This paragraph is informational only since these activities are not part of this grant.
- 1.3 After each inspection, a report will be prepared on the results of the inspection, including an identification of the process(es) that was(were) found to be in violation, the process and emission data that were recorded or calculated which document the violation(s), and a statement of the applicable regulation(s) being violated.
- 1.4 The state will work with the Region and perform field investigations for Regional enforcement initiatives for sources targeted for inspection.

2.0 Permit Evaluations and Inspections

The state will conduct an appropriate evaluation of site acceptability for applications for permits to install only for the new Greenfield type sources that are the object of substantial public concern and have a very significant potential to cause adverse impacts on the neighboring public. Such evaluations are to include a determination on the acceptability of the proposed source with regard to its impact on the surrounding environment, and may include a determination of compliance with local zoning, if the state has reason to believe that local zoning may be a problem. The evaluation will be documented only if the site is determined to be unacceptable.

3.0 Complaint Investigation and Response

- 3.1 The state will enter into a computerized data system all air pollution complaints that are received including the complainant's name, nature of the complaint, any information that could identify the source of any emissions, and the response efforts of the state.
- 3.2 The state will evaluate all priority I and II complaints received for appropriate resolution method, and refer those complaints that can and should be addressed by another agency (local zoning or building department, local health department, or other county or state agency). The state will investigate all priority I and II complaints not referred to other agencies, using established priorities and procedures.
- 3.3 The state will document all violations, which are identified as a result of complaint investigations as resources allow.

4.0 Record Review and Documentation

- 4.1 The state commits to review, and document the review of, appropriate production records, reports, and program plans as required by the EPA regulations delegated to the state. The state will determine compliance with applicable regulations as to the timeliness and content of the submittal.
- 4.2 The state commits to document when company reported data regarding process operation, monitor operation, and/or emission data show violations. Permit conditions will be maintained in the inspection file.
- 4.3 The state commits to process compliance waiver applications where allowed by NESHAP and MACT regulations, and monitor compliance waiver milestones.
- 4.4 The state commits to determine if NSPS sources have been tested in accordance with 40 CFR Part 60.

5.0 Miscellaneous

- 5.1 The state intends to adopt the federal regulation for municipal solid waste landfill emissions from existing landfills by reference into the state's regulations.
- 5.2 Due to resource limitations, the state is unable to commit neither to implementing the CFC and halon-recycling provisions neither of the federal Clean Air Act Amendments (CAAA) nor to conducting related source inspections. Specific commitments may be made in the event federal funding and/or federal assignee staff is provided.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 27, 2003

Program: Compliance Program

PPA #: PPA-4-3

PPA Title: Escalated Enforcement

PROJECTED STATUS AT END OF FY2003:
2005:

PLANNED COMMITMENT FOR FY2004-

A. Work-years of effort: 5.0

A. Work-years of effort: 5.0

B. Key responsible person(s): Tim McGarry

B. Key responsible person(s): Tom Shanley

C. Key responsible group: Enforcement

C. Key responsible group: Enforcement

D. Estimated total PPA costs: \$ 375,500

D. Estimated total PPA costs: \$ 381,350

E. **FY2003 Status Narrative:**

Refer to the end of year status narrative for FY02 provided as part of the 4th quarter report.

F. **FY2004-2005 Commitment Narrative:**

For non -Title V sources, the state will:

1.0 Violation Identification and Documentation

1.1 Within 30 days of finding a violation of any state or federal regulation as a result of inspections, review of documents or submitted test data, the MDEQ will send a Letter of Violation (LOV) to the source documenting the violation and requiring corrective action(s).

1.2 The MDEQ will maintain a log of all LOVs sent, including the nature of the violation, resolution course-of-action, and current status.

1.3 The MDEQ will participate in monthly conference calls with the EPA to provide updated enforcement status information for High Priority Violators [*], identify new High Priority Violators, identify new CEM violations, and discuss zero date, case lead, evidence, time line for resolution and injunctive and penalty relief, and use of the Supplemental Environmental Project (SEP) Policy dated May 1, 1998. Violations of federal asbestos demolition/renovation regulations and federal multi-media violations will be discussed in the same manner.

2.0 Escalated Enforcement

2.1 The MDEQ will initiate the appropriate escalated enforcement response for all SIP, NSPS, PSD, non-transitory NESHAP and MACT violations statewide consistent with the EPA's Revised HPV/T&A Guidance dated December 22, 1998. The MDEQ's specific commitment on case timeliness is item 2.2, below.

2.2 By September 30, 2004, the MDEQ commits to resolve all state-lead, High Priority Violations at SIP, NSPS, PSD, non-transitory NESHAP, and MACT sources statewide identified as of October 1, 2001.

2.3 The MDEQ will identify and treat as a High Priority Violator, any source that fails to run a federally required CEM, submit data, or maintain compliance with emission limitations (as shown by CEM data) where use of CEM data is the compliance determination method.

2.4 The MDEQ commits to require, where appropriate, that violating sources enter into formal enforceable stipulation agreements. The state will pursue appropriate penalties for all High Priority Violators consistent with the EPA's Revised HPV/T&A Guidance dated December 22, 1998.

2.5 The MDEQ will initiate appropriate enforcement action that may include revocation of the permit to install or permit to operate against all sources that do not provide a timely and satisfactory corrective program for significant permit violations.

2.6 The MDEQ will take appropriate enforcement action on asbestos demolition/renovation work practice violations, consistent with the EPA's Revised HPV/T&A Guidance (dated December 22, 1998), and the Revised Asbestos NESHAP Strategy addendum (dated October 27, 1993), as well as the Asbestos Penalty Policy Guidance (dated May 5, 1992).

3.0 Escalated Enforcement Activities

3.1 The MDEQ commits to perform the following escalated enforcement activities for all violations referred for enforcement action, including all identified as High Priority Violations. This includes the following activities:

- a) Review documentation of the violations, staff observations and other file materials to identify potential enforcement options, which may include the EPA involvement related to High Priority Violators.
- b) Determination of an enforcement strategy, in consultation with field staff and Attorney General's office.
- c) Preparation of enforcement documents such as Notices of Violation, Administrative Complaints, and Consent Orders.
- d) Conduct negotiations with violators.

3.2 The MDEQ commits to provide litigation support on all air violations referred to the State Attorney General for formal enforcement action. Activities include coordination of technical support for litigation, preparation of litigation summaries, case research, witness preparation, and other assistance to the case attorney.

3.3 The MDEQ commits to continue development of enforcement procedures as needed.

3.4 The MDEQ agrees to work with the Region to perform field investigations and case development for Regional enforcement initiatives as the MDEQ resources allow. Inspection reports and case documentation shall be prepared as requested.

Notes:

[*] High Priority Violator is defined to include the following:

1. A major source in violation of a SIP requirement.

2. A major source in violation of a federal regulation (NSPS, NESHAP, MACT, PSD, Offset, or a Major Offset or PSD source operating without an Offset or PSD permit).

A major source operating in violation of a substantive term of an order previously entered to resolve a High Priority Violation.

A major source in substantial violation of the obligation to submit a Title V permit application or failure to comply with Title V certification requirements.

A "synthetic minor" source which violates an emission limitation or permit condition that affects the source's PSD, NSR, or Title V status.

A major source in violation of an emission limitation or other standard, which meets the criteria specified in the High Priority Violation Matrix, Section II.B, of the EPA's Revised HPV/T&A Guidance dated December 22, 1998.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 16, 2003

Program: Compliance Program

PPA #: PPA-4-4

PPA Title: Continuous Emission Monitoring (CEM)

PROJECTED STATUS AT END OF FY2003:

PLANNED COMMITMENT FOR FY2004-2005:

A. Work-years of effort: 2.4

A. Work-years of effort: 2.4

B. Key responsible person(s): Gerald Avery & Michael Bray

B. Key responsible person(s): Gerald Avery & Michael Bray

C. Key responsible group: Compliance and Dry Cleaning Unit

C. Key responsible group: Technical Programs Unit

D. Estimated total PPA costs: \$ 180,240

D. Estimated total PPA costs: \$ 183,048

E. FY2003 Status Narrative:

Refer to the end of year status narrative for FY2002 provided as part of the 4th quarter report.

F. FY2004-2005 Commitment Narrative:

For non-Title V sources, the state will:

1.0 CEM Operation

The MDEQ will require the installation and operation of CEM on all sources subject to CEM requirements under current state or federal regulations. The MDEQ will also notify all sources that are required by federal or state regulations to install and operate CEM to submit quarterly Excess Emission Reports (EER) and periodic quality assurance test results.

2.0 Inventory

The MDEQ will maintain an up-to-date database of all facilities subject to a CEM requirement in the SIP or NSPS. The database will include information on the facility, type of source, emission limits/permits, monitoring, and quality assurance.

3.0 Review and Documentation

- 3.1 The MDEQ commits to continue to quality assure existing and new monitors at sources subject to NSPS or SIP requirements.

Quality assurance of monitors shall include review and approval of the monitor certification test, quality assurance/quality control (QA/QC) program, and the most recent performance audit.

- 3.2 The MDEQ commits to review and track quarterly EERs for monitors subject to NSPS and SIP requirements.
- 3.3 The MDEQ commits to review and approve the location for monitors installed on all new sources subject to NSPS regulations and state Part 11 rules.

4.0 Reporting

Within 60 days of the end of each quarter, the MDEQ commits to submit (using PC formatted disk(s) to the EPA the following information:

- a) Updates of the MDEQ's CEM inventory. This includes information on site identification, description of the source, stack parameters, enforcement status, monitor descriptions, certification dates, and the dates of the most recent quarterly QA/QC performed on the monitors.
- b) Copies of all CEM certification letters sent to facilities during the quarter. The letters will indicate if the monitor is a new installation or a replacement monitor.
- c) Summaries of all quarterly excess emissions and monitor performance from facilities required to report to the EPA and the MDEQ.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 17, 2003

Program: Compliance Program

PPA #: PPA-4-5

PPA Title: NESHAP Asbestos Demo/Reno Compliance Program

PROJECTED STATUS AT END OF FY2003:

PLANNED COMMITMENT FOR FY2004-2005:

A. Work-years of effort: 3.2

A. Work-years of effort: 3.2

B. Key responsible person(s): Gerald Avery & Michael Bray

B. Key responsible person(s): Gerald Avery & Michael Bray

C. Key responsible group: Compliance Support and Dry Cleaning Unit

C. Key responsible group: Technical Programs Unit

D. Estimated total PPA costs: \$ 240,320

D. Estimated total PPA costs: \$ 244,064

E. FY2003 Status Narrative:

Refer to the end of year status narrative for FY2002 provided as part of the 4th quarter report.

F. FY2004-2005 Commitment Narrative:

1.0 Inspections

- 1.1 The MDEQ commits to conduct inspections of asbestos demolition/renovation (demo/reno) projects in accordance with the EPA's "Implementation Strategy for Revised Asbestos NESHAP" (dated January 1991). Facilities to be inspected will be identified through notifications, complaints, and other elements of our non-notifier program. Conducting inspections identified from complaints is a high priority for the program because many of the complaints involve violations of the Asbestos NESHAP. Inspections will also be conducted based on asbestos notifications for demo/reno projects. A total of 275 inspections will be conducted provided three inspectors are devoted to the MDEQ's asbestos NESHAP program.
- 1.2 The selection of which asbestos demo/reno projects for which notification has been provided will be inspected based upon an inspection targeting ranking system consistent with the EPA's "Implementation Strategy for Revised Asbestos NESHAP" dated January 1991. Rankings will be documented and maintained on a computer based logging system.
- 1.3 For each inspection of asbestos/NESHAP demolition projects as well as abatement projects and landfills receiving asbestos waste, an inspection checklist will be completed. Upon identification of a potential violation appropriate sampling and analysis for asbestos content will occur. The samples will be maintained under proper chain-of-custody for a period of five years.

2.0 Documentation and Review

- 2.1 The MDEQ commits to review all asbestos demo/reno notices received to assure each notice is timely and complete. The MDEQ will retain the original notice. When late or incomplete notice is received, contact will be made with the noticing party within 2 working days requesting missing information for incomplete notices. The response will be reviewed to ensure that the missing information is supplied.
- 2.2 The MDEQ commits to maintain documentation of all subject notifications received, inspections conducted, and violations cited for notification deficiencies and work practices. Information will be maintained on a computer database system.

3.0 Reporting

- 3.1 Within 30 days of the end of each quarter, the MDEQ commits to submit quality-assured quarterly reports on formatted disk(s) for the EPA's use with the ACTS II system. The reports will include the following information for activities occurring during the quarter:
 - a) Information on all NESHAP-subject demo/reno notifications received, including: the postmark date, project dates, facility name and address, abatement and demolition contractors, disposal site, late and incomplete deficiencies, deficiency letter date, party determined to be responsible for deficiency, and which notifications are for emergency removal or ordered demolition projects.
 - b) Inspections conducted, including the date of inspection, identification of work practice violations, date of LOV sent, date order entered, and date of referral to the EPA or the State Attorney General for litigation.
- 3.2 The MDEQ commits to submit, upon request, inspection reports in accordance with the asbestos NESHAP strategy.

4.0 Non-notifier Program

The MDEQ's non-notifier program will continue to focus on outside agency coordination, self-initiated inspections, and receipt of complaints to identify NESHAP-subject facilities that do not comply with the notification requirements. When traveling to targeted demo/reno projects for inspection, efforts are made to investigate demo/reno's discovered. To the extent feasible, non-notifiers are identified through coordination with state and local agencies that issue building and demolition permits, inspect demo/reno projects or administer other state or federal asbestos programs. In addition, the MDEQ's outreach efforts identify how citizens and industry personnel can report non-notifiers and other potential asbestos NESHAP violations.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 27, 2003

Program: Compliance Program

PPA #: PPA-4-6

PPA Title: Legal Services, Attorney General

PROJECTED STATUS AT END OF FY2003:

PLANNED COMMITMENT FOR FY2004-2005:

A. Work-years of effort: 2.0

A. Work-years of effort: 2.0

B. Key responsible person(s): Tim McGarry

B. Key responsible person(s): Tom Shanley

C. Key responsible group: Enforcement Unit

C. Key responsible group: Enforcement Unit

D. Estimated total PPA costs: \$100,000

D. Estimated total PPA costs: \$ 145,000

E. **FY2003 Status Narrative:**

Refer to the end of year status narrative for FY02 provided as part of the 4th quarter report.

F. **FY2004-2005 Commitment Narrative:**

For non-Title V sources, the state will:

The state commits to maintain legal services from the State's Attorney General to provide the following:

1. File litigation, as appropriate, to enforce the federal Clean Air Act (CAA) and the air pollution control portion of the Natural Resources and Environmental Protection Act. Defend the MDEQ on all litigation filed against these parties involving air pollution matters.
2. Support administrative enforcement actions through discussions about choice of enforcement options, review of enforcement documents, and representing the MDEQ in contested case hearings.
3. Serve as Legal Counsel to the MDEQ. Participate in and prepare legal documents for all declaratory ruling requests.
4. Provide legal or enforceability certifications, as required under the federal CAA.
5. Advise the AQD on legal issues, particularly on the legality and defensibility of individual policy decisions.
6. Serve as liaison with the EPA Regional Counsel on joint enforcement actions.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit).

Date: June 26, 2003

Management

Program Category: Air

Index: PPA-5

PPA TITLE: Operation of Ambient Air Quality Monitoring Network

PROJECTED STATUS AT END OF FY2003: PLANNED COMMITMENT FOR
FY2004-2005:

A. Work years of effort: 14.0

A. Work years of effort: 13.0

B. Key responsible person: Craig Fitzner

B. Key responsible person: Craig Fitzner

C. Key responsible group: Air Monitoring Unit

C. Key responsible group: Air Monitoring Unit

D. Estimated total PPA costs: \$ 1,051,400

D. Estimated total PPA costs: \$ 991,510

E. **FY2003 Status Narrative:**

During FY03, the MDEQ brought on three new staff members for 105 grant programs: a quality assurance coordinator, a field operations supervisor and a monitoring site operator. These positions had been vacant due to retirements in FY02 and early FY03.

From October 1, 2002 through September 30, 2003, the MDEQ continued to operate the National Air Monitoring Stations (NAMS), State and Local Air Monitoring Stations (SLAMS), and SPM air monitoring network in accordance with the EPA-approved standard operating procedures.

PAMS operations during FY03 continued unchanged from FY02. The auto gas chromatograph operated as a continuous VOC measurement device at the Wayne County East 7 Mile Road site (26-163-0019). NO_y and meteorological monitoring continued at the PAMS site in Holland (26-005-0003). Quality assurance audits were performed as required. Equipment purchases were coordinated with EPA Region V.

Two toxics monitoring stations in Detroit, a station in Grand Rapids, one near Houghton Lake (as a rural background toxics and ozone site), and a fifth site in Ypsilanti were again deployed as part of the Michigan Toxics Air Monitoring Program (MITAMP). Thirty-nine VOC and 13 trace metal measurements were taken and reported to AQS as part of this program.

MDEQ coordinated with various USEPA offices in the set up of the Detroit Exposure Study.

MDEQ continued to participate with the Wisconsin Department of Natural Resources and the Minnesota Air Pollution Control Agency in the operation of an ambient mercury monitoring trailer.

Quality Assurance Program

The implementation of a new, unplanned USEPA monitoring initiative in FY03 has had considerable impact on current network operations. The impact was felt especially hard on site operation/maintenance, training and quality assurance.

Sample completeness for NAMS/SLAMS sites during FY03 is expected to exceed 75 percent with the possible exception of the SO₂ monitor at Detroit Southwest High School (26-163-0015). AQD is currently performing a detailed quality assurance analysis of 1st and 2nd quarter data from 2003 at this site.

The MDEQ continued to collect Precision and Accuracy data in accordance with our Standard Operating Procedures. MDEQ expects to meet the 95 percent precision and accuracy probability limits during FY 03 except possible for SO₂ at Detroit Southwest High School (26-163-0015).

MDEQ Laboratory staff certified our primary ozone standard at the EPA Region V offices during February 2003.

The MDEQ continued to participate in the AREAL and Region V inter-laboratory audits.

The MDEQ performed systems and performance audits as required by MOA at the Seney and Peshawbeistown ozone monitoring sites.

Data Management

During FY03, the MDEQ continued to process and report air quality data to the now upgraded AIRS in a timely manner. All precision and accuracy data has been submitted to the EPA on schedule using the PARS program. The 2002 SLAMS Summary report was certified July 1, 2003.

The MDEQ continued to feed ozone and PM_{2.5} data to USEPA's AIRNOW system.

MDEQ staff attended the annual AQS conference in Albuquerque, New Mexico during March 2003.

The MDEQ staff published its 2002 annual air quality report in March 2003 and will have its 2002 report published by September 30, 2003.

F. FY2004-2005 Commitment Narrative

Operation of Ambient Air Monitoring Network:

A final 2003 general network description will be submitted to EPA by December 31, 2003. Any changes from the previous description will be reviewed with the EPA. Where appropriate, the MDEQ will request the EPA's approval of its monitoring networks.

Operation of the NAMS/SLAMS and PAMS networks will continue. Proposed solutions for any technical deficiencies found in EPA audits will be submitted within 30 days, in accordance with 40 CFR 58.25.

A draft equipment list for FY2004 is submitted to the EPA with this PPA.

We will continue to operate the Michigan Toxics Air Monitoring Network (MITAMP) and will continue to coordinate with USEPA in the analysis and the reporting of data collected thus far. MDEQ will also continue the deployment of the collaborative ambient mercury monitoring trailer.

Quality Assurance Program

With the hiring of new staff in FY03 to complete the operational implementation of USEPA's new monitoring initiative, MDEQ plans to make monitoring operation/maintenance and quality assurance its highest priority objective.

MDEQ will strive to have sample completeness for NAMS/SLAMS sites exceed 75 percent at all sites.

The MDEQ will continue to collect Precision and Accuracy data in accordance with our Standard Operating Procedures.

MDEQ Laboratory staff will certified a primary ozone standard at the EPA Region V offices prior to the commencement of ozone monitoring in March 2004.

The MDEQ will participate in any inter-laboratory audits.

If the Memorandum of Agreements is renewed, the MDEQ will perform systems and performance audits at the Seney and Peshawbeistown ozone monitoring sites.

Data Management

MDEQ will continue to process and report air quality data as well as precision and accuracy data to AQS within 90 days of the end of each calendar quarter.

MDEQ will continue to collect and feed PM2.5 and ozone data to AIRNOW in a timely manner.

MDEQ staff will attend the national AQS/AIRS conference in 2004.

MDEQ staff will publish its annual air quality report for 2003 by September 30, 2004.

AQD Equipment, CSS&M and Contractual Budget for AMU: \$326,996

A. Equipment-\$92,310

Item	Quantity Budgeted	Unit Cost	Item Cost	Running Total Expenditure
3 API Model 700 multipollutant calibrators	3	\$15,000	\$45,000	\$45,000
5 API ozone monitors	5	\$6662	\$33,310	\$78,310
2 API carbon monoxide monitors	2	\$7,000	\$14,000	\$92,310

B. CSS&M-\$234,686

Category	Item	Unit Cost	Item Cost	Running Total
Criteria (operation support contracts)	a) KZO ozone contract	\$1750/yr \$5380/yr \$7100/yr	\$14,230	\$14,230
Criteria	Mowing contract (Lansing)	\$500/yr	\$500	\$14,730
Criteria	Replace manifolds at Wayne County sites	\$1000	\$1000	\$15,730
Criteria	3 Heating & cooling units for shelters	\$1200	\$3,600	\$19,330
Criteria	Specialized Dasibi monitor parts and repair (Company is out of business)	\$3,000	\$3,000	\$22,330
Criteria	Frankfort site upgrades	\$10,000	\$10,000	\$32,330
Criteria	Precision & Span Gases	\$5445	\$5445	\$37,775
Criteria	Misc. telecommunication upgrades (phone lines, modems, loggers)	\$6000	\$6000	\$43,775
Hg	Lumex Calibration	\$500	\$500	\$44,275
Hg	Air Gases for Tekrans	\$1315	\$1315	\$45,590
Hg	LP gases for Tekrans	\$425	\$425	\$46,015
Hg	Misc Tekran Parts and Repair	\$1500	\$1500	\$47,515
MDEQ Lab/Programmin g	LIMS Query Upgrade	\$3000	\$3000	\$50,515
MDEQ LAB	MDEQ Shop Services	\$55,000	\$55,000	\$105,515
MDEQ LAB	MDEQ Lab Standards & Supplies and analytical equipment repair	\$20,000	\$20,000	\$125,515
MITAMP	5 Boxes Carbonyl Cartridges	\$200	\$1000	\$126,515
MITAMP	National Lab Services	\$47,538	\$47,538	\$174,053
MITAMP	25 Summa Canisters	\$495	\$12,375	\$186,428
PAMS	1 SYSDAT Statistical Package	\$2000	\$2000	\$188,428
PAMS	GC operation Gases	\$1000	\$1000	\$189,428
PAMS	4 Time blocks for GC support (contract)	\$8000	\$32,000	\$221,428

PAMS	GC Service Contract	\$4700	\$4700	\$226,128
QA	Audit gases	\$1385	\$1385	\$227,513
QA	Probe inlet audit plumbing	\$1500	\$1500	\$229,013
QA	Met Data Auditing Supplies	\$5,673	\$5,673	\$234,686
			T	\$2

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit).

Date: June 25, 2003

Program: Air Management

Index: PPA-6

PPA TITLE: Point Source Emissions Data

PROJECTED STATUS AT END OF FY 2003: PLANNED COMMITMENT FOR FY2004-2005:

A. Work-years of effort: 3.5

A. Work-years of effort: 3.5

B. Key responsible person: John Schroeder

B. Key responsible person: John Schroeder

C. Key responsible group: Emissions Reporting and Assessment Unit

C. Key responsible group: Emissions Reporting and Assessment Unit

D. Estimated total PPA costs: \$ 262,850

D. Estimated total PPA costs: \$ 266,945

E. FY2003 Status Narrative:

Point source data necessary to calculate 2002 emissions was collected from over 1,800 facilities. The processing of this data is continuing and a 2002 point source emission inventory will be completed during the summer of 2003. The point source emission inventory will be submitted to the EPA in the National Emissions Inventory (NEI) system format by June 2004. The MDEQ is also working to prepare 2002 emissions estimates for area and off-road source categories.

The MDEQ provided the Michigan 2001 point source inventory to the EPA NEI prior to June 1, 2003. Corrections were also made to the 1999 annual emissions estimates provided for criteria pollutants for point and area sources and 1999 hazardous air pollutant estimates provided for point sources, originally submitted to EPA in 2002. The MDEQ will continue to follow-up on any questionable data that is identified by the EPA quality assurance procedures and edit checks during the remainder of FY 2003.

F. FY2004-2005 Commitment Narrative:

The MDEQ will submit the year 2002 emissions data in accordance with the requirements contained in the EPA Consolidated Emissions Reporting Rule (40 CFR 51.1 – 51.45) prior to June 1, 2004. The 2002 data will include estimates for point, area and off-road mobile emissions. An on-road mobile inventory will be submitted if the Michigan Department of Transportation (MDOT) and the Southeast Michigan Council of Governments (SEMCOG) has the resources to prepare it. The MDEQ will continue to devote resources to upgrade the state inventory system to ensure compatibility with new EIIP procedures and the data reporting requirements identified in the Consolidated Emissions Reporting Rule.

As resources allow, the MDEQ will send representatives to appropriate national emissions inventory conferences and NEI training sessions or conferences held at the EPA Region 5 office. The MDEQ will continue to support efforts by the EPA, LADCO, and others to improve the national ozone modeling inventories for use in attainment demonstrations and will participate in the development of a regional inventory to support the regional haze and PM2.5 planning effort.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 23, 2003

Program: Air Management

Index: PPA-7

PPA Title: Great Lakes Air Toxics Deposition

PROJECTED STATUS AT END OF FY2003:
2005:

PLANNED COMMITMENT FOR FY2004-

A. Work-Years of Effort: 3.5

A. Work-Years of Effort: 3.2

B. Key Responsible Person: Joy Taylor Morgan

B. Key Responsible Person: Joy Taylor Morgan

C. Key Responsible Group: Environmental Science,
Services & Emissions, Reporting and Assessment
Assessment

C. Key Responsible Group: Environmental Science,
Services & Emissions, Reporting and

D. Estimated Total PPA Costs: \$262,850

D. Estimated Total PPA Costs: \$ 244,064

E. FY2003 Status Narrative:

F. FY2004-2005 Commitment Narrative:

The AQD will participate in research projects and policy issues that address identification and reduction of persistent bioaccumulative air toxic pollutants.

The AQD will continue to participate in the development of the regional air pollutant inventory development system (RAPIDS) currently administered by the Great Lakes Commission in coordination with the USEPA efforts. The AQD will continue to submit Great Lakes air toxics emissions data to the EPA and the Great Lakes Commission in RAPIDS format.

The AQD will participate in the Great Waters Strategic Planning Process and work with other partners in the region on policy issues that address atmospheric deposition of persistent bioaccumulative pollutants to inland lakes and the Great Lakes.

The AQD will participate in work groups and task forces on atmospheric deposition of air toxics as appropriate and as resources allow.

The AQD will continue efforts focused on monitoring and reduction activities related to sources that emit mercury and products that contain mercury focusing on pollution prevention and recommended alternatives to these products to continue to reduce the use and release of mercury to Michigan's environment.

The AQD will continue use of mercury monitoring equipment purchased with Great Lakes Section 105 funds,

and coordinate with Minnesota and Wisconsin on the shared use of this equipment.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

Agency: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit.)

Date: June 27, 2003

Program Category: Air Management

Index: PPA-10

PPA TITLE: Market-based Initiatives

PROJECTED STATUS AT END OF FY 2003:

PLANNED COMMITMENT FOR FY2004-2005:

A. Work-years of effort: 2.0

A. Work-years of effort: 1.0

Key responsible person: Robert Irvine

B. Key responsible person: Robert Irvine

C. Key responsible group: Strategy Development Unit

C. Key responsible group: Strategy Dev. Unit

D. Estimated total PPA costs: \$ 150,200

D. Estimated total PPA costs: \$ 76,270

Program Plan Elements (See PPA instruction sheet)

FY 2003 Status to Date:

The MDEQ continued working with EPA Region 5 staff to obtain federal approval for the Emission Trading Program (Program). This has focused on understanding and evaluating concerns described in the September 30, 2002 report from the Office of Inspector General.

The MDEQ continued to provide input via LADCO and directly to the EPA on regional and national emission trading issues and emission trading policy development. The MDEQ has continued to work with other states (most recently West Virginia) to aide in the development of other state trading programs, and is implementing an interstate Memorandum of Understanding with the State of Wisconsin.

As of June 27, 2003, the MDEQ received 36 Program notices for FY-2003, of which 17 were for ERC generation, 18 for ERC retirement and 1 for ERC transfer.

On a daily basis, the MDEQ has provided technical support to the regulated community. This has included assistance in: 1) completing Program notices, 2) answering questions regarding the requirements of the Program and review status of the notices, 3) discussing proposed trading scenarios, and 4) providing information related to the federal approvability issues and rulemaking process.

FY 2004-2005 Commitment:

The MDEQ will continue to work with the EPA to gain federal approval for the Program SIP submittal.

The MDEQ will continue to provide input on regional, national, and international emission trading program

developments.

The MDEQ will continue to process all Program notices received.

The MDEQ will continue to administer the Program Registry and Emission Trading Home Page on the Internet, and will carry out further Registry enhancements and information upgrades as needed.

The MDEQ will continue to revise operational procedures needed for implementation of the Program as needed. The MDEQ will conduct a sufficient number of audits of emission averaging plans and ERC transactions across a spectrum of sources.

The MDEQ will continue to provide technical assistance to the regulated community and other potential Program participants.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit.)

Date: June 20, 2003

Program: Air Management

Item: PPA-11

PPA Title: New Source Review

PROJECTED STATUS AT END OF FY2003:

- A. Work Years of Effort: 12.0
- B. Key Responsible Person: Lynn Fiedler
- C. Key Responsible Group: Permit Section
- D. Estimated Total PPA Cost: \$ 901,200
- E. **FY2003 Status Narrative:**

PLANNED COMMITMENT FOR FY2004-2005:

- A. Work Years of Effort: 12.0
- B. Key Responsible Person: Lynn Fiedler
- C. Key Responsible Group: Permit Section
- D. Estimated Total PPA Cost: \$ 915,240

During FY2003, the AQD devoted resources to conducting an independent engineering review of non-Title V sources required to get permits by MDEQ rules and regulations. These applications are referred to as "minor" sources, as they are not considered "major" under the EPA and federal CAA definitions. The review includes evaluation of the applications for compliance with state regulations, including air toxics, state best available control technology (BACT) for VOC, emission limitations, nuisance prohibition, and protection of NAAQS and PSD increments.

A public comment period and hearing, if requested, was held for a few of these minor sources, as per state requirements. These few sources are judged to be controversial, thus the public comment process allows the opportunity for public input into the decision.

Staff assisted companies with non-Title V sources by meeting with them to explain the requirements to secure a Permit to Install.

Permit Section staff, along with others in the AQD and in concert with other interested parties, continued in FY2003 the process of looking for ways to streamline the state minor source review program. Staff developed two new general permits –specific types of burn-off ovens and portable natural gas fired boilers.

During FY2003 staff continued to participate in the implementation of the Clean Corporate Citizen program, which is designed to assist, in various ways, industry in the new source review permit process.

The AQD continued to work cooperatively with the EPA during FY2003 to resolve any outstanding issues related to the Michigan's new source review SIP. The AQD committed to commencing the rule making process according to the following timeline.

Action Step	Original Proposal	Completed
Comments on draft rules package received from EPA	March 29, 2002	May 2002
All comments incorporated into draft rules	May 20, 2002	May 2002
Public Notice placed in newspapers	July 15, 2002	September 23, 2002
Public Hearing on draft rules package	August 15, 2002	November 6, 2002
Legislative Service Bureau Formal Certification	December 23, 2002	May 2, 2003
Office of Regulatory Reform Certification	December 30, 2002	May 7, 2003
Joint Committee on Administrative Rules Review	February 5, 2003	May 16, 2003
Rules go into effect	March 16, 2003	July 2003?

The AQD committed to submitting to U.S. EPA, by no later than the start of the public comment period, copies of all PSD applications, and for all applications subject to a public comment process, appropriate and pertinent information for U.S. EPA review. It was agreed that due to the short timeframe between completion of the review, including the development of the public participation documents, and the announcement of the public comment period, this would be done by e-mail notification. Copies of the files would be provided as quickly thereafter as possible.

On March 3, 2003, the AQD commenced implementation of the new source review reforms promulgated December 31, 2002. As one of the few delegated states, Michigan has taken a leadership role in the implementation of these requirements. As we implement 40 CFR Part 52.21 as amended, we will work closely with EPA staff in the Region and OAQPS.

F. FY2004-2005 Commitment Narrative:

The AQD commits to continue conducting independent engineering reviews of applications for new or modified minor sources of air pollution. These reviews determine whether or not the proposed source is able to comply with all applicable state requirements, including air toxics, state BACT for VOC, emission limitations, nuisance prohibition, and protection of NAAQS and PSD increments. Public comment periods and hearings will be held for all controversial applications in accordance with state requirements.

The AQD commits to continue developing additional exemption rules, and developing general permits to install, in order to further streamline state permit requirements for minor sources of little air quality significance.

The AQD commits to work cooperatively with the EPA to assure that the MDEQ's Clean Corporate Citizen program is implemented in a manner that is consistent with the federal new source review regulations.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit.)

Date: June 30, 2003

Program: Air Management

Item: PPA-12

PPA TITLE: Support Services - Laboratory and Maintenance

PROJECTED STATUS AT END OF FY2003:

A. Work-years of effort: 6.8

B. Key responsible person(s): Amy Butler

C. Key responsible group: Environmental Science and Services

D. Estimated total PPA costs: \$448,999

E. **FY2003 Status Narrative:**

All commitments were met under this PPA.

F. **FY2004-2005 Commitment Narrative:**

This PPA provides support services, which include laboratory and equipment maintenance functions as follows:

Laboratory Services: Provide analytical and technical services that include filter analyses, sample analyses, development of analytical methods, and identification of toxic air pollutants. The laboratory also verifies standards used in the field for calibration of equipment.

Equipment Maintenance Services: Provide equipment maintenance and repair services for air monitoring and air sampling equipment.